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**IFRS Technical Committee**

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Berlin, 4 January 2016

Dear Hans,

**IASB's ED/2015/10 – Annual Improvements to IFRSs 2014-2016 Cycle**

On behalf of the Accounting Standards Committee of Germany (ASCG) I am writing to comment on the IASB's ED/2015/10 *Annual Improvements to IFRSs 2014-2016 Cycle*. We appreciate the opportunity to comment on the Exposure Draft.

We fully agree with the proposed amendments to IFRS 1, IFRS 12 and IAS 28 and also agree with the proposed transition provisions.

Process-wise, and in line with our separate remarks on the 2015 Agenda Consultation, we support addressing these amendments through the Annual Improvements Process instead of having three separate narrow-scope amendments. As laid out in our response to the Agenda Consultation, we suggest reconsidering the borderline between (a) narrow-scope and non-urgent amendments, that we believe should be fed into a single annual "omnibus" amendment (i.e. the AIP), and (b) narrow-scope but urgent issues, that warrant a separate narrow-scope amendment. In this regard, it is not obvious why the recently proposed amendment to IAS 40 had not been included in this AIP as we fail to see the urgency of the issue.

Yours sincerely,

*Andreas Barckow*  
President

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